

H1 LAW GROUP
701 N. Green Valley Parkway, Suite 200
Henderson, Nevada 89074
Tel: 702-608-3720



H1 LAW GROUP

Eric D. Hone, NV Bar No. 8499

eric@h1lawgroup.com

Joel Z. Schwarz, NV Bar No. 9181

joel@h1lawgroup.com

701 N. Green Valley Parkway, Suite 200

Henderson, NV 89074

Phone 702-608-3720

Fax 702-703-1063

Molly M. Lens, CA Bar No. 283867

(*Pro Hac Vice* application to be submitted)

O'Melveny & Myers LLP

mlens@omm.com

1999 Avenue of the Stars, 7th Floor

Los Angeles, CA 90067

Phone 310-246-8593

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSELL G. GREER,

Plaintiff,

vs.

FREMANTLE PRODUCTIONS NORTH
AMERICA, INC., a corporation,

Defendant.

Case No. 2:21-cv-01905-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO RESPOND
TO COMPLAINT [ECF No. 11]**

FIRST REQUEST

Plaintiff Russell G. Greer (hereinafter "Plaintiff"), in proper person, and Defendant Fremantle Productions North America, Inc. (hereafter "Defendant"), by and through counsel, hereby agree and stipulate to extend Defendant's deadline to respond to the complaint [ECF No. 11] from January 4, 2022, to January 25, 2022. Defendant has not previously requested an extension of this deadline.

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1 The parties agree that good cause exists to warrant entry of an Order by the Court
2 reflecting the agreement of the parties as set forth above, including consideration of the
3 schedules of Defendant's counsel during the holiday season.

4 Dated this 28th day of December 2021.

Dated this 28th day of December 2021.

5 RUSSELL G. GREER

H1 LAW GROUP

6 /s/ Russel G. Greer

/s/ Joel Z. Schwarz

7 Russell G, Greer
8 russmark@gmail.com
9 P.O. Box 46602
Las Vegas, NV 89114
Phone 801-895-3501

Joel Z. Schwarz, NV Bar No. 9181
joel@h1lawgroup.com
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Henderson, NV 89074
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10 *Pro Se Litigant*

Attorneys for Defendant

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13 **IT IS SO ORDERED:**

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15 **UNITED STATES MAGISTRATE JUDGE**

16 Dated: _____
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